

TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

Tel: (718) 762-1324 troylaw@troypllc.com Fax: (718) 762-1342
41-25 Kissena Boulevard, Suite 119, Flushing, NY 11355

September 4, 2019

Via ECF

Hon. Elizabeth S. Stong
U.S. Bankruptcy Court, EDNY
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East- Suite 1595
Brooklyn, NY 11201

Re: Letter Motion Requesting to Extend Time to File Proof of Claims and Object to Dischargeability
1-19-bk-43583-ESS *In re Jing Yang*

Dear Honorable Judge Stong:

This office represents the creditors Ming En Wang and Troy Law, PLLC. We write respectfully to request extension of time to (1) object to debtors dischargeability; and (2) file Proof of Claims for both the creditors. This is Creditors first request for extension of time and granting such request will not prejudice any party.

On June 10, 2019, Debtor Jing Yang filed Chapter 13 for Bankruptcy and the undersigned office did not receive any mail notification of the bankruptcy filing from the Court nor the Debtors attorney. It was not until September 03, 2019, did Counsel for the Creditors realize Debtor Jing Yang filed for bankruptcy on June 10, 2019. Upon further review of the docket, Creditors realized the reason for not receiving the notifications from the Court regarding the above matter is due to excluding Suite number of Troy Law, PLLC. *See* Exhibit 1, Creditors list. Thereafter, the Counsel filed his notice of appearance and informed the chambers regarding the same. For all the foregoing reasons, the undersigned respectfully requests this Court to grant two weeks extension of time to object to dischargeability of Debtors and extend one week of time to file proof of claims for both creditors Ming En Wang and Troy Law, PLLC.

For all the foregoing reasons, the undersigned respectfully requests Your Honor to grant two weeks of time to object to dischargeability and one week of time to file Proof of claims for both Ming En Wang and Troy Law, PLLC.

We thank the Court for its time and consideration in this matter and apologize for any inconveniences caused to this court.

Respectfully submitted,

/s/ John Troy
John Troy

Attorney for Creditors

cc: via ECF
all counsel of record